

YPLSF  
B.1  
9/21/1992

BRIEFING PAPER FOR DANA RASMUSSEN  
NO ACTION RECORD OF DECISION  
21 SEPTEMBER 92  
10:45 p.m.

**PURPOSE**

- \* Seek RA approval/disapproval of the No Action ROD and Intent to Delete for the Yakima Pesticide Lab site. Approval of ROD would count site as a "construction complete" bean.

**BACKGROUND ON SITE**

- \* The site, a RCRA site on NPL, is located at the Yakima Agricultural Research Station in Yakima, Washington. From 1965 to 1985, the Lab discharged dilute pesticide waste into a septic tank and drainfield system.
- \* A site closure plan, meeting RCRA interim status standards, was approved on January 30, 1990. Closure activities were removal and disposal of septic tank contents, excavation and removal of septic tank and drainfield and washdown pad removal. About 40 cubic yards of soil containing pesticides above the cleanup levels were removed. Sampling and analysis of soil and groundwater demonstrate that no residual contamination remains at the site based on  $10^{-6}$  cancer risk.
- \* RCRA "clean closure" was completed at the site. "Clean closure" means removal of all waste residues and equipment.

**COORDINATION OF RCRA/CERCLA ACTIONS**

- \* New process - deletion of a site from the NPL where cleanup was conducted under authority other than CERCLA.
  - \* Sought input from OGC, ORC, OERR, RCRA and Ecology.
- \* Ecology certified RCRA closure. EPA proposed by public notice "equivalency" of closure by removal with closure requirements for permitted facilities.
- \* EPA issued CERCLA "No Further Action" Proposed Plan for public comment. Held public meeting on September 10th. Comment period for CERCLA and RCRA actions closes September 22nd. To date no comments received.
  - \* Plan to issue Notice of Intent to Delete concurrent with ROD. Will be Region's 2nd deletion; 1st deletion of RCRA site.
- \* A few days after comment period ends, ROD and Notice of Intent to Delete will be ready for your signature. At that point site will be counted as a "construction complete" bean for 1992 4th quarter.
- \* USDA, the PRP, has been very cooperative.

Staff contact: Lynda Priddy x32712; ORC contact: Tod Gold x32569

BRIEFING PAPER FOR JERRY EMISON  
CERCLA NO ACTION PROPOSED PLAN  
12 AUGUST 92  
1:30 p.m.

**PURPOSE**

- \* Seek RA/DA approval/disapproval of CERCLA Proposed Plan and scheme for Yakima Pesticide Lab site. Probable "construction complete" bean.

**BACKGROUND ON SITE**

- \* The site, a RCRA site on NPL, is located at the Yakima Agricultural Research Station in Yakima, Washington. From 1965 to 1985, the Lab discharged dilute pesticide waste into a septic tank and drainfield system.
- \* A site closure plan, meeting RCRA interim status standards, was approved in January 30, 1990. Closure activities were removal and disposal of septic tank contents, excavation and removal of septic tank and drainfield and washdown pad removal. Approximately 40 cubic yards of contaminated soil containing pesticides above the cleanup levels were removed. Sampling and analysis of soil and groundwater demonstrate that no significant residual contamination remain at the site based on  $10^{-6}$  cancer risk.

**ACTIONS AT SITE**

- \* New process - deletion of a site from the NPL where cleanup was conducted under authority other than CERCLA.
- \* RCRA "clean closure" was completed at the site. "Clean closure" means removal of all waste residues and contaminated equipment. Ecology is certifying closure. EPA is proposing by public notice "equivalency" of closure by removal with closure requirements for permitted facilities.
- \* Issuing CERCLA "No Further Action" Proposed Plan.
  - \* Issue Notice of Intent to Delete concurrent with ROD. Will be Region's 2nd deletion; 1st deletion of RCRA site.

**COORDINATION OF RCRA/CERCLA ACTIONS**

- \* Developed a new process for concurrently closing RCRA site and deleting NPL site. Sought input from OGC, ORC, OERR, RCRA and Ecology.
- \* Will hold public meeting during 30-day comment period with intention of 4th quarter ROD. Expect no public input. No comments received on closure plan.
- \* USDA, the PRP, has been very cooperative.

Staff contact: Lynda Priddy x32712; ORC contact: Tod Gold x32569

## Why are we here

- approval on No Action Proposed Plan <sup>for RCRA site</sup> and ~~plan for deletion of a RCRA site from NPL.~~

if we get your approval we

- expect 4<sup>th</sup> quarter "construction complete"

This site <sup>NPL</sup> — in Yakima at ARJ USDA PRP

<sup>Superfund</sup>

- site itself — is a septic tank system into which dilute pesticide waste disposed. <sup>for 20 yrs.</sup>
- RCRA closure plan for clean closure was approved in Jan 90.
- RCRA <sup>cleanup</sup> actions at site have been implemented
  - all contain ~~above~~ <sup>below</sup> clean up levels ~~of~~ <sup>below</sup>  $10^{-6}$  have been removed.

## What are we doing now

- plan to issue No Action PP next week — with ~~4<sup>th</sup> quarter~~ ROD late September
- concurrent with PP
  - Ecology issuing letter to USDA approving completion & closure
  - EPA is cert. equiv.

which means post-closure permit not required because closure meets 264 closure-by-removal stds.

- 30 day comment period for equiv. and PP and public meeting
- do not expect public comment
- 2<sup>nd</sup> deletion for Region
- 1<sup>st</sup> " via RCRA

Coordination - OMC ORC OERR RCRA Ecology  
USDA - very cooperative

### Next ~~State~~ Steps:

- publish notice next week for PP + equiv.
- issue ROD late Sept
- concurrent with notice of Intent to Delete.



8.2

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, Washington 98101

Rely to  
Attn of: HW-113

SEP 30 1992

MEMORANDUM

SUBJECT: Approval of CERCLA Record of Decision and Construction Complete Determination and RCRA Clean Closure

FROM: Randall F. Smith, Director  
Hazardous Waste Division

TO: Dana Rasmussen  
Regional Administrator

Attached is the final Record of Decision (ROD) and Construction Complete Determination for the Yakima Pesticide Lab Superfund Site. Your signature is requested on this document. The remedy selected for this site, pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), is No Further Action. This site has been the subject of a "clean closure" pursuant to the Resource Conservation and Recovery Act (RCRA). Remedial action taken under RCRA included removal and disposal of septic tank contents, the septic tank and washdown pad, excavation of contaminated soil to an approved off-site disposal facility, and soil and groundwater monitoring. Monitoring of groundwater and soil remaining around the contaminated area indicates that the remedial activities implemented under RCRA have successfully reduced the risk at the site to within the  $10^{-6}$  risk level. I believe conditions at the site met the CERCLA requirements for No Further Action and RCRA requirements for "clean closure."

On September 21, 1992, I discussed with you the background of the site and the Superfund Program's determination that a No Further Action ROD should be issued for this site. No comments were received on the Proposed Plan during the public comment period. Therefore, the remedy as detailed in the ROD is consistent with the remedy presented to the public and described to you previously.

8.1

The Washington State Department of Ecology concurs on the selected No Further Action remedy and has certified completion of RCRA remedial action at the site.

Attachment

The Washington State Department of Ecology concurs on the selected No Further Action remedy and has certified completion of RCRA remedial action at the site.

Attachment

CONCURRENCES												
INITIAL	<i>LEP</i>	<i>AM</i>	<i>W</i>	<i>OK</i>								
URNAME	Priddy	Sonnenfeld	Wetse	Rushin								
ATE	7/30/92	7/30/92	7/30/92	7/30/92								

CONCURRENCES												
INITIAL	<i>TG</i>	<i>em</i>	<i>K</i>	<i>F</i>								
URNAME	Gold	Mednick	Kowalski	Fox								
ATE	9-30-92	9-30-92	9/30/92	9/30/92								